

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Complaint on Sunday  
and Holiday Collections

Docket No. C2001-1

NOTICE OF THE UNITED STATES POSTAL SERVICE  
OF FILING OF REVISED RESPONSES TO DFC/USPS-14, 35, 38  
(July 12, 2001)

On June 12, the Postal Service filed a response to DFC/USPS-14 that stated, among many other things, that information in Headquarters files indicated that the Triboro District in NY had collected on a Saturday collection schedule on Monday, July 3, 2000. Apparently, however, that statement was based either on a transcription error, or on counsel's (hopefully temporary) confusion regarding the distinction between the Triboro District (essentially Brooklyn, Queens, and Staten Island) and the New York District (Manhattan and the Bronx). Subsequent reexamination has revealed that the Headquarters file actually indicate that it was the New York District that collected on a Saturday collection schedule on Monday, July 3, 2000. Copies of the relevant files are included in USPS-LR-C2001-1/4. Officials in the Triboro District have now confirmed that Triboro actually collected on a normal weekday schedule on Monday, July 3, 2000. Therefore, a revised copy of the second page of the response to DFC/USPS-14 is attached. The attached page of the revised response replaces "Triboro" with "New York," and it should be inserted as a substitute second page of the three-page response originally filed to DFC/USPS-14.

Unfortunately, that straightforward revision does not put the matter to rest. Several subsequent interrogatories filed by Mr. Carlson follow-up on that portion of the original response to DFC/USPS-14. For example, DFC/USPS-32 requested confirmation that neither Triboro nor any other district was required by the Headquarters July 4th Holiday memo to notify Headquarters that collections on Monday, July 3, 2000

were being shifted to a Saturday schedule, and the response was to confirm. In that instance, while the question probably would have been reworded to specify the New York District rather than Triboro based on the revised answer to DFC/USPS-14, the response would have been the same either way, and the answer is correct as it stands and conveys all necessary information. Therefore, there appears to be no need to revise that response.

That is not the case with DFC/USPS-35. This item posed a series of questions about the Triboro District, assuming that Triboro had shifted to Saturday collection on July 3, 2000. Moreover, the responses were prepared under that assumption as well. (Thus, in discussion to prepare the responses, Triboro officials were not directly asked to verify that collections had been shifted, they were only asked for the reasons why they would shift collections, under the assumption that such a shift had occurred.) After consultation with Mr. Carlson, it was decided that the most direct way to resolve the situation was to file a revised response to DFC/USP-35 which provides the information requested, but put into the context of the New York District, rather than the Triboro District. A revised response to DFC/USPS-35, supplemented to achieve that result, is attached. It completely replaces the original response to DFC/USPS-35. New material within that response, as well as the other revised responses, is printed in **bold**.

With respect to DFC/USPS-38, there is no apparent need to revise the responses to parts a.-f. Part g. of the question, however, does refer to curtailed collections in Triboro. Therefore, the response to part g. is revised to include an additional paragraph that clarifies the situation with respect to the Triboro and New York Districts. That paragraph is added on the last of six pages of the response, and therefore the attached page can be substituted for the last page of the original response to DFC/USPS-38, while all previous pages remain unchanged.

A final question which refers back to the response to DFC/USPS-14 is

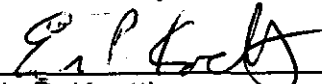
DFC/USPS-52. That response, however, correctly summarizes the information that has been presented in LR-4, does not mention the Triboro District, and therefore does not appear to need to be revised.

While the confusion caused by the error in the original response to DFC/USPS-14 is regrettable, perhaps this can be viewed as an educational experience, in the hope that none of us will ever again be tempted to confuse the New York District with the Triboro District, unless the Postal Service once again reorganizes its field organizational structure.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

  
Eric P. Koetting  
Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record.

  
Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2992/ FAX: -5402  
July 12, 2001

REVISED PORTION OF DFC/USPS-14

SUBSTITUTE FOR THE SECOND PAGE OF  
THE ORIGINAL THREE-PAGE RESPONSE

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For example, for the Christmas/New Years holiday period in 1998, 14 notices with respect to early pickups on holiday eves were filed, from Providence RI, Triboro (NY) District, Detroit MI, Albany NY, Boston MA, Capital Metro, Baltimore MD, Northern VA, Houston TX, San Antonio TX, Middlesex MA District, Dakotas District, Connecticut District, and Northland (MN) District. As might be expected given the circumstances of those holidays in 1999 (i.e., both eves on a Friday), that number doubled to 28 notices, from the Greater Michigan District, Central Illinois District, Royal Oak MI, Appalachian (WV) District, Baltimore MD, Capital Metro, Northern VA, Dakotas District, Northland (MN) District, Central New Jersey District, Long Island (NY), Northern New Jersey District, Triboro (NY) District, Albany NY, Boston MA, Connecticut District, Middlesex (MA) District, SE New England, Western NY District, Atlanta GA, South Florida District, Dallas TX, Louisiana District, Rio Grande District, Colorado/Wyoming District, Las Vegas NV, Seattle WA, and Spokane WA. In contrast, in 2000, no notices were received for Christmas Eve or New Year's Eve, presumably because those days fell on Sundays, and no collections were scheduled anyway. (In 2000, however, two notices were received with respect to advanced collections on the Saturdays which were the days before Christmas and New Year's Eve, from Royal Oak MI and the Appalachian (WV) District.)

With respect to the Fourth of July, only one District, **New York** in NY, shows up in the files as moving its collections on Monday, July 3, 2000, to a Saturday schedule. Others may have done so, but no such records have been found in the Headquarters files. With respect to all Federal holidays other than Christmas/New Years and

REVISED RESPONSE TO DFC/USPS-35

COMPLETELY REPLACES ORIGINAL RESPONSE

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**DFC/USPS-35.** Please refer to the responses to DFC/USPS-14 and -16.

- a. Please confirm that the Triboro District administers post offices located in the New York City boroughs of Brooklyn, Queens, and Staten Island. If you do not confirm, please explain.
- b. Please confirm that some collection boxes located in Flushing (Queens), New York, have weekday collections at 10 AM and 5 PM and a single Saturday collection at 10 AM. If you do not confirm, please explain.
- c. Please explain why the Postal Service could not have avoided "routine Monday operations" on Monday, July 3, 2000, by eliminating the *early* collection or collections on collection boxes that have multiple weekday collections and performing only the *final* posted weekday collection.
- d. Please confirm that no sign or announcement was posted at the main post office at 41-65 Main Street in Flushing, New York, on the afternoon of Saturday, July 1, 2000, informing customers that the collection boxes in Flushing would be collected on Monday, July 3, 2000, according to the posted Saturday collection time. If you do not confirm, please provide a copy of the sign or announcement and explain where the sign or announcement was posted.
- e. Does the Postal Service believe that media announcements in New York City concerning curtailed collections on Monday, July 3, 2000, obviated the need to post this information at the main post office in Flushing?
- f. Please provide a copy of each announcement that the Triboro District provided to the media concerning curtailed collections on Monday, July 3, 2000.
- g. Please provide a copy of every announcement that actually appeared in the media and a copy of which the Postal Service possesses.
- h. Please identify the media outlets that actually published information concerning curtailed collections.
- i. Please confirm that collection boxes located in La Guardia Airport and John F. Kennedy International Airport are under the jurisdiction of the Triboro District. If you do not confirm, please explain.
- j. Please confirm that observing a Saturday collection schedule in the Triboro District meant that some collection boxes that were accessible to the public on Monday, July 3, 2000, would not have been collected at all because some collection boxes located in the Triboro District are not scheduled for Saturday collections. If you do not confirm, please explain.

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a. Confirmed that the Triboro District includes, but is not limited to, the areas stated in the question. **The New York District includes Manhattan and the Bronx.**

b. Confirmed. **In the New York District, it is also common on weekdays to have a morning pickup and a late afternoon pickup, similar to the times suggested in the question, and on Saturday only the one earlier pickup. If there are two pickups scheduled on Saturday, one is often scheduled very early in the morning, and the last pickup would usually be between 11 am and 2:30 pm.**

c. Saturday collections are scheduled to cover the one delivery day in the week on which most businesses are closed. The decision in the **New York District** to go to Saturday schedules on Monday, July 3, 2000, was made in light of the fact that most businesses would not be open, normal mail volumes would not be present, and the Saturday collection schedule would therefore be more appropriate than a weekday collection schedule. It would not be possible to achieve the cost savings gained from switching to a Saturday schedule by instead trying to run collections on the last scheduled weekday pickup. In other words, there would be no practical efficiencies to be gained merely by dropping the earlier of two scheduled weekday collections.

**New York District personnel provided the following example. An office might have eight carriers on weekdays doing collection runs. Those carriers cover the morning collection, the afternoon collection, and also pick up mail from businesses. On Saturday, because the businesses are closed, one carrier will be scheduled to handle the same area covered on weekdays by eight carriers. That**



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single carrier could not do late afternoon collections over the entire area.

Saturday collections are scheduled early because traffic is lighter, because most of the mail picked up on Saturday is actually mail deposited on Friday after the last pickup (e.g., if there are two pickups on Saturday, the very early morning pickup will usually have much more mail than the later pickup), and because the mail processing operations are on an earlier schedule due to the light volume.

The decision to go to a Saturday collection schedule in the New York District on July 3, 2000 was also substantially influenced by the presence of OpSail (a celebration of tall sailing ships) in the city on that day. As indicated in the materials filed in LR-4, that event caused streets south of Canal to be shut to vehicular traffic on July 3, 2000. Traffic congestion, of course, was not limited to that area, and only got worse as the day progressed. Under these circumstances, dropping morning collections and maintaining late afternoon collections was not a logistical option, even had it been feasible from a staffing perspective (which it would not have been, as explained above).

d. Since Triboro actually collected on a normal schedule on Monday, July 3, 2000, no such signs would have been posted in Flushing. In the main post office in Manhattan, the James A. Farley Building at 421 8th Avenue, the recollection is that no such signs were posted to indicate that the New York District was shifting to a Saturday schedule on that Monday. Signs may have been posted in other retail locations in the District, but the size of the Farley Building tends to make signs less practical than at other facilities.

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e. No. On the other hand, it seems reasonable to expect that the overlap between the group of people that might deposit mail in collection boxes in the **New York** district on Monday, July 3rd, and the group of people who might see a sign in the main post office in **Manhattan** on the afternoon of Saturday, July 1st, would not necessarily be extensive.

f. No such copies could be located, **as Triboro in fact did not curtail collections on Monday, July 3, 2000.** A notice issued by the New York District, however, may be found in LR-4.

g. **Only one** such copy could be located. A copy of an email message that may be found in LR-4 indicates that New York District actually placed a "Public Notice" ad in the Saturday, July 1 issue of the NY Daily News which provided, along with other holiday information, notice that collections would be conducted on a Saturday schedule on Monday, July 3. **A copy of that ad is attached.**

h. No **further** information is available on the media outlets that actually published notices regarding curtailed collection in the **New York** District on July 3, 2000, but see the above response to part g.

i. Confirmed.

j. **On Monday, July 3, 2000,** collection boxes in the Triboro District **were collected on the normal weekday collection schedule. In the New York District, all boxes accessible to the public are scheduled for Saturday collection. On Monday, July 3, 2000, therefore, the schedule shift to a Saturday schedule did not result in any boxes not being collected. For those boxes in the vehicle-exclusion**

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zone south of Canal St., however, the boxes were swept in the very early morning (e.g., 6 am), and then sealed such that no further mail could be deposited until the sealing device was removed.

ATTACHMENT TO  
REVISED RESPONSE  
TO DFC/USPS-35.g  
7/12/01

**Postal Service Schedule**

Due to the holiday, mail collections from public mailboxes in Manhattan and the Bronx will follow a Saturday schedule on Monday, July 3. There will be no mail collections on July 4. Regular collections will resume on July 5.

REVISED PORTION OF DFC/USPS-38(g)

REPLACES LAST PAGE OF ORIGINAL RESPONSE  
TO DFC/USPS-38

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possibility creeps in, however, the fact that the mailer nevertheless chose to deposit the mail shortly before the last scheduled pickup may provide some indication of the level of interest the mailer has in whether the mail is processed before or after the holiday.

**This question was originally posed and answered with respect to a mailer in the Triboro District, but subsequent investigation has established that it was the New York District, and not the Triboro District, that shifted to a Saturday collection schedule on Monday, July 3, 2000. An additional point with respect to this change of circumstances bears mention. One major reason that collections were shifted in the New York District on that day was the presence of OpSail, which completely disrupted activity in, at least, lower Manhattan. See LR-4 and the revised response to DFC/USPS-35. If the customer hypothesized in this question had been approaching a collection box in that part of the city on the afternoon of July 3, 2000, it perhaps would not be unreasonable to believe that the customer might have been even more likely to realize that normal weekday collection times would not apply.**